

## **Our Services & Fees**

### **Background – The Purpose of this Document**

It's great that you are considering taking advantage of our services. Before we complete any work for you there are some things that we want to tell you about our services and how we will charge for them. You can use this document to decide whether our services are right for you.

Please do take the time to read it - it only takes a few minutes, it contains important information about our services. Please tell us if you need any extra help or support in accessing our services.

### **Are our services regulated?**

Yes – most of what we do is regulated by the Financial Conduct Authority. However, services relating to most Buy to Let Mortgages are not regulated.

You can see full details of how we are regulated and what permissions we hold in Section 1

Our services relating to residential mortgages, protection and general insurance are also covered by the Financial Services Compensation Scheme. The scheme does not cover services in respect of Buy to Let mortgages.

You can also find more details about the compensation scheme in Section 1.

### **What kind of service do we offer?**

We offer advice on mortgages, life and health insurance products and household insurance.

For mortgages we make recommendations from a broad and comprehensive range of lenders from across the market.

For most insurance advice we make recommendations from a range of insurers which is representative of the whole market. For some, more specialist, insurance products we offer advice from a narrower range or from single providers.

You can see details of our range of products and providers and further details about our services (including information on special advice situations like taking further advances/additional borrowing and advice on mortgages in later life) in Section 2

There are limitations to our advice. For example, if you are using a government scheme or any shared appreciation, or shared equity scheme (or similar arrangements) to help you buy your property then we won't advise you on the suitability of that scheme. We don't give tax advice. Section 2 also gives more information about this.

### **What do we charge for our services?**

For insurance products we will receive commission from the product provider. We will not charge separate fees for these services. For mortgages we may charge you a fee for our advice. You can see more details about our charges in Section 3.

### **What if you have a complaint?**

We hope that you will love the services that we provide. But if something does go wrong, then we will work hard to put things right. You also have access to our complaints procedures. If you are still not happy then you may be able to refer your case to the Financial Ombudsman Service (FOS). You can see more information about our complaints procedures and the types of cases that FOS can consider in Section 4.

## How will we handle your personal data?

We will keep your personal information private and confidential, even if you are no longer a client.

You can see full information of how we will handle your data in our separate Privacy Statements. We can provide you with a copy of these or they can be accessed via our website. We may also make electronic checks to verify your identity or for fraud prevention.

You can see more information about data privacy and electronic checks in Section 5

Section 6 contains information about how we manage conflicts of interest and our procedures relating to client money.

# 1. Regulatory Status & Protections

## Our Regulatory Status

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We are an Appointed Representative of the PRIMIS Mortgage Network, a trading name of Advance Mortgage Funding Limited, which is authorised and regulated by the Financial Conduct Authority (FCA). The FCA is a financial regulatory body who is independent.

PRIMIS is included on the Financial Services Register under registration number 305008. You can check this via the FCA website [www.fca.org.uk](http://www.fca.org.uk) or by calling them on 0800 111 6768.

PRIMIS Mortgage Network authorise us to advise and make arrangements in relation to:

- Lifetime Mortgages
- Mortgages
- Life and Health Insurance

**\*The FCA does not regulate our services/activities for Buy to Let mortgages that are taken out for investment purposes (investment Buy-to-Let mortgages)**

The FCA does supervise firms who advise or arrange, Consumer Buy-to-Let mortgages. However, **the regulatory protections offered in respect of Consumer Buy-to-Let mortgages are limited.** A Consumer-Buy-to-Let Mortgage is a buy-to-let mortgage which is not entered into wholly or predominantly as an investment or business by the borrower.

The documentation that we provide will tell you whether any mortgage that we are recommending is a Consumer Buy-to-Let.

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## The Financial Services Compensation Scheme

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We are covered by the Financial Services Compensation Scheme (FSCS). You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim.

Further information about this scheme is available from the FSCS website [www.fscs.org.uk](http://www.fscs.org.uk) or by writing to:

Financial Services Compensation Scheme  
PO Box 300

The Financial Services Compensation Scheme does not cover any services that we provide in respect of Investment Buy-to-Let or Consumer Buy-to-Let mortgages.

## 2. Our Services

### What type of service do we offer?

We provide an **advised** service. This means that we will assess your needs and make a personal recommendation for each of the mortgage and / or insurance areas in which you have asked us to provide a service.

We act for you and not the insurer or the mortgage lender in connection with the services we provide.

Our advice is based on your circumstances at the time the advice is given.

My recommendations are based on my understanding of current legislation, which is subject to change.

### Whose products do we offer?

#### Insurance

We offer products from a range of insurers for the following insurance products: *term assurance, family income benefit, non-investment whole of life assurance, critical illness insurance and income protection insurance*. The range of insurers is based on a fair analysis of the relevant market.

We only offer products from One Family for over 50s life insurance.

#### Mortgages and Buy to Let Mortgages

We offer a comprehensive range of first charge mortgages from across the market, but not deals that you can only obtain by going direct to a lender.

We do not offer advice in relation to second charge mortgages however we can make a referral to a suitable firm to discuss your needs.

A list of our mortgage providers can be found on the PRIMIS website [www.primis.co.uk/consumer-zone](http://www.primis.co.uk/consumer-zone)

You can also ask us for a copy of the mortgage providers that we work with.

#### Lifetime Mortgages

We offer a comprehensive range of Lifetime Mortgage products from across the market, but not deals that you can only obtain by going direct to the lender or provider.

## Lifetime Mortgages

A list of our Lifetime Mortgage providers can be found on the PRIMIS website [www.primis.co.uk/consumer-zone](http://www.primis.co.uk/consumer-zone)

We only offer products from a limited number of lenders.

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### **Are there any limitations to the advice we are providing?**

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Our advice is limited to providing advice on appropriate mortgage, protection and/or insurance solutions from our range of providers and lenders.

We do not provide tax advice. If you are in any doubt, you should seek appropriate advice on any tax implication of the transactions that you enter.

Where you are making use of government schemes (for example right-to-buy or transactions which involve the Help-to-Buy scheme) or other shared appreciation or shared equity schemes, our advice is limited to the regulated mortgage contract. Our advice does not include advice on the suitability of other schemes.

We might sometimes suggest you consider placing a policy into trust. Where we do so, we are providing general guidance of the benefits of trusts and/or information on routes for placing your policies into them. We are not providing a specific recommendation about whether any individual trust is right for you. You should take specialist trust advice if you are in any doubt.

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### **Increasing borrowing on an existing property**

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If you are seeking advice for increasing the borrowing secured on a property which is subject to an existing mortgage, we will consider whether you should:

- take a further advance/additional borrowing from your current lender
- take out a new mortgage with a different lender

We will not consider second charge loans or unsecured lending. In some circumstances, these options might be available and appropriate for you.

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### **Borrowing into retirement**

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We can offer advice on a number of products where you are considering borrowing on an interest-only basis into your retirement.

Where you are borrowing on this basis, a Lifetime Mortgage might be more suitable option for you than traditional mortgages. A Lifetime Mortgage is a type of loan which does not need to be repaid until you die, sell the property or go into long-term care. The interest on a Lifetime Mortgage is usually rolled up into the loan instead of being repaid each month. If you wish to consider this option, we can offer advice on Lifetime Mortgages.

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### **Your duty to provide full and accurate information**

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It is your responsibility to provide full and accurate information to us and to any product provider or lender that we might recommend.

Failure to disclose material information could invalidate any recommended insurance or could result in a mortgage application being declined.

We rely on the information you have disclosed to us. We cannot be held responsible for any consequences arising from the information held on your file becoming inaccurate as a result of changes that you have not told us about.

## 3. Our Fees and Charge

### What are our Fees and Charges?

#### Insurance

We will not charge you a fee for our services relating to insurance, but we will receive commission from the product provider. The commission will be calculated as a proportion of the premiums paid for the insurance product.

You will receive a quotation which will tell you about the fees and charges relating to any insurance policy that we recommend.

#### Mortgages / Lifetime Mortgages

For our advice services, we will charge a fee of between £0 and £995.

A typical fee for our Mortgage Service will be £495 however, this will depend on your circumstances.

A typical fee for a Lifetime Mortgage will be £995.

From the fees above if charged, part of this fee will be our administration fee of £150 which is payable on application and the balance of the fee will be payable on completion for Mortgage.

The fee for Lifetime Mortgages will be payable on completion only.

#### Refunds

If we charge you a fee and your lending does not go ahead, you will not receive a refund for the administration fee and will not be charged our completion fee.

#### Procurator Fee

We will also be paid a procurator fee by the lender. The amount of the procurator fee will be disclosed to you.

You have the right to ask us to provide information on the range of procurator fees that the lenders on our panels offer to us.

If an application is submitted to a lender via a packager (a 3<sup>rd</sup> party specialist) we will be paid commission by the packager. This will be disclosed to you.

## 4. Complaints

### What to do if you have a complaint?

We hope that you will be satisfied with the service that we provide. If you wish to register a complaint, please contact us via any of the following methods:

**In Writing:** The Customer Resolution Team, PRIMIS Mortgage Network, 3700 Parkside, Birmingham Business Park, Solihull. West Midlands. B37 7YT.

**By Telephone:** 0121 767 1139

**By Email:** [complaints.solihull@primis.co.uk](mailto:complaints.solihull@primis.co.uk)

PRIMIS will aim to deal with your complaint quickly and impartially. You can see our full complaints procedures via our website [www.primis.co.uk](http://www.primis.co.uk) and following the links for Customer Complaints from the home page. If we cannot resolve your complaint to your satisfaction, you may be entitled to refer it to the Financial Ombudsman Service.

Full details can be found on its website at [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

**The Financial Ombudsman Service do not have the power to make judgements in respect of Buy-to-Let mortgages where the mortgage was taken out predominantly for investment or business purposes. This includes most Buy-to-Let Mortgages. Our final response to any complaint will tell you whether you have the right to refer it to the Financial Ombudsman Service.**

## 5. Data Security & Privacy

### Client Confidentiality

We will keep all your personal information private and confidential, even if you are no longer a client. This is in line with current data protection legislation. Our Data Privacy Statement provides full information about how we will use your data including:

- What data will be obtained.
- Use of data and who it will be shared with.
- Your right to access the Data.

We can provide a copy of our Data Privacy Statement on request or you can find it on our website [www.elsbyassociates.co.uk](http://www.elsbyassociates.co.uk)

### Electronic verification of identity

We are required by law to confirm your identity. This means we need evidence of who you are and where you live. If the service is being provided to a legal entity (for example, a limited company or partnership) we are required to verify the identity of the beneficial owners, Directors or partners. This is to comply with money laundering regulations.

We may attempt to check your identity electronically based on information we hold. We may also pass on and exchange information with appropriate agencies in order to carry out those searches and checks. Where the check is unsuccessful, we will require alternative proof of identification.

Electronic identity checks will leave an enquiry footprint on your credit file for each check carried out but will not affect your credit score. In making use of our services, you confirm your acceptance of our use of credit reference agencies which will result in such a record.

## 6. Other Important Information

### Payments to us

You should only pay money to us in respect of any fees we have charged for **our services**. We accept no other payments. We do not accept payments in cash.

You should pay third parties, such as providers or lenders directly.

We are not authorised to hold client money (*that is, money which is to be held or processed on your behalf*).

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## **Conflicts of interest**

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We maintain procedures to prevent and manage conflicts of interest arising between you and us, or PRIMIS, or between you and any other client of ours, or of PRIMIS'.

Circumstances might occasionally arise where we consider that these procedures will not be sufficient to ensure, with reasonable confidence, that the risks of damage to your interests will be prevented. In these cases, we may not be able to act for you. Where our procedures would allow us to act, we will clearly disclose the following to you in writing before we undertake any business for you:

- a specific description of the conflict of interest that has arisen;
- the risks to you that arise from the conflict of interest;
- confirmation that we do not consider that our normal organisational and administrative arrangements are sufficient to mitigate these risks.

Our disclosure will provide sufficient information to enable you to make an informed decision about the risks to you and whether you should proceed with the service.

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## **Customer service**

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It is vital that you fully understand the advice and documents given to you. If there is anything which might prevent this from happening, or may act as a barrier to this occurring, such as your health or another situation, please let me know as soon as possible. Such information will be held in strict confidence. Depending on the circumstances, our service will be personalised so that you receive the best possible experience in our dealings.

We are continually striving to maintain a high standard of service for all our customers so during our advice process we (our network PRIMIS) will email you to seek feedback on our service and the advice provided.